

Exhibit 7



IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

NETLIST, INC., (CAUSE NO. 2:21-CV-463-JRG
)
Plaintiff, ()
vs. ()
SAMSUNG ELECTRONICS CO., LTD., ()
et al., () MARSHALL, TEXAS
(APRIL 17, 2023
Defendants.) 8:30 A.M.

VOLUME 2

TRIAL ON THE MERITS

BEFORE THE HONORABLE RODNEY GILSTRAP
UNITED STATES CHIEF DISTRICT JUDGE
and a jury

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1 THE COURT: Be seated, please.

2 Are the parties prepared to read into is the record those
3 items from the list of pre-admitted exhibits used by last
4 Friday's portion of the trial?

5 MS. TRUELOVE: Yes, Your Honor.

6 THE COURT: Please proceed.

7 MS. TRUELOVE: The following JTX exhibits were used
8 Friday during trial. That would be: 002, 003, 004, 005, 006,
9 0021, 0024, 0029, 0043.

10 The following PX numbers were also used: 0446, 0464,
11 0586, 0621, 1663, 1756, 1778, and 1816.

12 And my understanding is Defendants don't have anything to
13 tender to the Court.

14 THE COURT: All right. Do Defendants have any
15 objection to the rendition offered by Plaintiff?

16 MS. DEGNAN: No, Your Honor.

17 THE COURT: And can you confirm Defendants don't
18 have additional items from the list of pre-admitted exhibits
19 to put into the record?

20 MS. DEGNAN: That's correct.

21 THE COURT: All right. Mr. Milton, if you'll return
22 to the witness stand, please, sir. I remind you, you remain
23 under oath.

24 Is there anything, Counsel, I need to hear from you on
25 before I bring in the jury?

1 the '918 and '054 Patents in the DDR5 products we looked at
2 first?

3 A. That would be 33 percent speed reduction.

4 Q. And to confirm, the way they could have done that is
5 to move the power management off the module. Is that right?

6 A. That's right. They could have used the earlier
7 technology where it was not on-module.

8 Q. Okay. So now let's look at the benefits of the '339.

9 Has Samsung identified any alternative technology that
10 it could have used in place of the '339 inventions to achieve
11 DDR4 speeds in the LRDIMM accused products?

12 A. No, they have not.

13 Q. If Samsung was aware of an alternative, would you have
14 expected them to say so?

15 A. Yes. Typically that's what's happened, in my experience.

16 Q. And can you summarize the benefits of the '339 invention
17 that you've explained?

18 A. Sure. So here I've shown memory controller with four
19 channels. This is representative of, again, modern servers,
20 and each channel is populated with two DIMMs in this case.
21 Without the invention, they could only support one DIMM.
22 And so, as a result, the capacity with the '339 invention is
23 doubled.

24 Q. Would DDR4 LRDIMM customers purchase modules that are not
25 capable of running at DDR4 speeds with two or more modules per

1 channel?

2 A. No, I don't -- I can't imagine that.

3 Q. So let's turn to the last part of your analysis. Can you
4 describe the comparability analysis you performed?

5 A. Yes. I was asked to consider a licensing agreement that
6 involved a company called Rambus, consider the technology that
7 was related to that, and comment on whether I thought it was
8 comparable to the technology in these patents.

9 Q. And did you find that the agreement was comparable?

10 A. Yes, I did. What I found is that the Samsung technology
11 related to DDR memory systems and communicating to DDR memory
12 systems and improving the speed with which the communication
13 could happen and reducing the power that was required.

14 Q. And what did you conclude about the licensed Rambus
15 patents?

16 A. That the license was comparable. The technology in the
17 licensing agreement was comparable to the technology in this
18 case.

19 Q. Did the patents relate to similar issues to the asserted
20 patents?

21 A. Yes, very much.

22 MR. MANZIN-MONNIN: Nothing further. I pass the
23 witness.

24 THE COURT: All right. Ladies and gentlemen, we're
25 just a few minutes before noon, and I've been informed by the

1 case or communicate about it in any way with anyone, including
2 the eight of yourselves.

3 And with that, ladies and gentlemen, you're excused for
4 the evening. I'll see you tomorrow morning.

5 (Whereupon, the jury left the courtroom.)

6 THE COURT: Be seated, please.

7 Counsel, for your information, we've used almost 6 hours
8 and 45 minutes of trial time today. The Plaintiff has 7 hours
9 and 58 minutes remaining; the Defendant has 7 hours and 56
10 minutes remaining.

11 Let me encourage you to the fullest extent of my ability
12 to meet and confer efficiently with regard to disputes that
13 may develop overnight. I will be in chambers, as I have been
14 throughout the trial, ready to meet with you in advance of
15 bringing in the jury and trying to streamline and narrow any
16 disputes that survive your stringent meet and confer efforts.

17 Is there anything that needs to be raised with the Court
18 from either Plaintiff or Defendants before we recess for the
19 evening?

20 MR. SHEASBY: Nothing for Plaintiff.

21 MR. CORDELL: Nothing for Defendants, Your Honor.
22 Thank you.

23 THE COURT: All right. We stand in recess until
24 tomorrow morning.

25 (The proceedings were concluded at 6:00 p.m.)